

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (READING)**

In Re: Case No. 16-11037-REF  
MICHAEL GEORGE SCHWENTNER and Chapter 13  
JOY N. SCHWENTNER,

Debtor(s).

**REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES**

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that ALDRIDGE PITE, LLP submits this Request for Special Notice and Service of Copies, for BANK OF AMERICA, N.A. and hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

ALDRIDGE PITE, LLP, submits this Request for Notice and Service of Copies as agent for BANK OF AMERICA, N.A. and not as counsel of record.

ALDRIDGE PITE, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

Jamie D. Hanawalt  
ALDRIDGE PITE, LLP  
4375 Jutland Drive, Suite 200  
P.O. Box 17933  
San Diego, CA 92177-0933

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of

the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004. This Request for Special Notice shall not operate as a confession and/or concession of jurisdiction. Moreover, the within party does not authorize ALDRIDGE PITE, LLP, either expressly or impliedly through ALDRIDGE PITE, LLP's participation in the instant proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004;
- c. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;
- d. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

Dated: December 27, 2016

ALDRIDGE PITE, LLP

/s/ Jamie D. Hanawalt  
Jamie D. Hanawalt  
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4375 Jutland Dr., Suite 200  
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**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF PENNSYLVANIA (READING)**

In re

JOY N. SCHWENTNER and MICHAEL  
GEORGE SCHWENTNER,

Debtor(s).

Case No. 16-11037-ref

Chapter 13

PROOF OF SERVICE

I, Maricela Sanchez-Estrada, declare that:

I am employed in the County of San Diego, California. My business address is: 4375 Jutland Drive, Suite 200; P.O. Box 17933, San Diego, CA 92177-0933. I am over the age of eighteen years and not a party to this cause.

On December 27, 2016, I served the REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES in said cause by electronic means through the court's CM/ECF system or by placing true and correct copies thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States Mail at San Diego, California, addressed as follows: SEE ATTACHED SERVICE LIST.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 27, 2016

/s/ Maricela Sanchez-Estrada  
MARICELA SANCHEZ-ESTRADA

**DEBTOR(S)**  
**(VIA U.S. MAIL)**

Michael George Schwentner  
Joy N. Schwentner  
4285 Scheidys Road  
Whitehall, PA 18052-1918

**DEBTOR(S) ATTORNEY**  
**(VIA ELECTRONIC NOTICE)**

KEVIN K. KERCHER  
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**CHAPTER 13 TRUSTEE**  
**(VIA ELECTRONIC NOTICE)**

FREDERICK L. REIGLE  
LISA MARIE CIOTTI  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
P.O. Box 4010  
Reading, PA 19606  
ecfmail@fredreiglechl3.com

**UNITED STATES TRUSTEE**  
**(VIA ELECTRONIC NOTICE)**

United States Trustee  
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